

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION, a)	Case No. 16-cv-1054 (WMW/DTS)
Delaware corporation,)	
)	
Plaintiff,)	
)	
v.)	
)	
FEDERAL INSURANCE COMPANY,)	
an Indiana corporation, and ACE)	
AMERICAN INSURANCE)	
COMPANY, a Pennsylvania)	
corporation,)	
)	
Defendants.)	

**DECLARATION OF HEATHER J. KLIEBENSTEIN IN SUPPORT OF
PLAINTIFF FAIR ISAAC CORPORATION'S MOTION TO STRIKE
DEFENDANTS' UNTIMELY DISCLOSED WITNESSES**

I, Heather J. Kliebenstein, declare as follows:

1. I am a shareholder with Merchant & Gould P.C., and I am one of the attorneys of record for Plaintiff Fair Isaac Corporation in the above captioned matter.
2. I make this declaration on my own information, knowledge, and belief in support of Plaintiff's Motion to Strike Defendants' Untimely Disclosed Witnesses.
3. Attached hereto as Exhibit 1 is a true and correct copy of Federal Insurance Company's Rule 26(a)(1) Supplemental Disclosures, served on January 28, 2019.
4. Attached hereto as Exhibit 2 is a true and correct copy of Federal Insurance Company's Rule 26(a)(1) Second Supplemental Disclosures, served on March 22, 2019.

5. Attached hereto as Exhibit 3 is a true and correct copy of an excerpt of Federal Insurance Company's Supplemental Answers to Plaintiff's First Set of Interrogatories, served on June 15, 2017.

6. Attached hereto as Exhibit 4 is a true and correct copy Federal Insurance Company's Second Supplemental Answers to Interrogatory Nos. 2, 3, and 4, served on May 25, 2018.

Dated: April 5, 2019

/s/ Heather J. Kliebenstein
Heather J. Kliebenstein